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*Attorney for Defendant Martin Guaglione*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARTIN GUAGLIONE,

Defendant.

CASE NO. 2:24-CR-00260-RFB-BNW

**STIPULATION AND [PROPOSED ORDER] TO ALLOW DEFENDANT MARTIN  
GUAGLIONE TO TRAVEL TO CALIFORNIA**

**IT IS HEREBY STIPULATED** by and between Martin Guaglione, Defendant, by and through his counsel, Paola M. Armeni, Esq., of the law firm of Clark Hill, PLLC, and the Plaintiff, United States of America, by and through Sue Fahami Acting United States Attorney, District of Nevada, and Jacob H. Operskalski, Assistant United States Attorney, that Mr. Guaglione be permitted to travel to California from March 18, 2025, to March 20, 2025 for the purpose of meeting with a realtor to sell his parents' home, both who have passed recently.

Pursuant to [DKT 7], Section III(d), of the Pretrial Diversion Agreement, Defendant must seek permission in writing from the United States Attorney's Office, United States Pretrial Services and **the Court** before traveling outside the District of Nevada.

The United States Attorney's Office does not have any objection to this travel request.

United States Pretrial Service Officer Samira Barlow has been consulted and has approved this travel request.

Mr. Guaglione agrees to comply with all conditions of the Pretrial Diversion Agreement.

Dated this 11<sup>th</sup> day of March 2025.

Sue Fahami  
ACTING UNITED STATES ATTORNEY  
DISTRICT OF NEVADA

CLARK HILL PLLC

/s/ Jacob H. Operskalski  
JACOB H. OPERSKALSKI  
Assistant United States Attorney  
Attorney for Plaintiff,  
UNITED STATES OF AMERICA

/s/Paola M. Armeni  
PAOLA M. ARMENI  
Attorney for Defendant,  
MARTIN GUAGLIONE

**ORDER**

Based on the foregoing stipulation and good cause appearing,

**IT IS HEREBY ORDERED** that Defendant, Martin Guaglione is permitted to travel to California, from March 18, 2025, to March 20, 2025.

**IT IS FURTHER ORDERED** that Defendant Martin Guaglione shall continue to comply with all conditions of the Pretrial Diversion Agreement.

**IT IS SO ORDERED.**

**DATED** this 17th day of March 2025.



UNITED STATES DISTRICT COURT JUDGE  
CASE NO.: 2:24-CR-00260-RFB-BNW